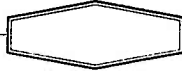


ASH GROVE CEMENT COMPANY



"WESTERN REGION"

August 11, 1994

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Dear Mr. Austin,

By letter of June 30, 1994, Jim Nolan asked Ash Grove to report on which of its reported emission violations (a) would not be violations under the permit modifications requested by Ash Grove in our May 9, letter to you, and (b) may be excusable under WAC 173-400-107. This letter contains the analysis requested by Mr. Nolan.

Table 1 - Monthly Tabulation of Reported Exceedances (Current Permit) is a tabulation of all exceedances reported by Ash Grove between November 1993 and May 1994 according to the current permit.

Table 2 - Monthly Tabulation of Reported Exceedances (Analyzer Malfunctions Eliminated) excludes CEM malfunctions. Early in the process we reported violations when the analyzer was down. It was agreed that, until PSAPCA adopts a definition of a CEM violation, those reported would not be considered violations and future monthly CEM-1 reports would not count CEM down time as violations.

In our May 9, 1994 letter, Ash Grove proposed that, to avoid double counting, our new source permits should be revised to delete the hourly mass limits for NO_x and SO₂, the 8 hour mass limit for CO, and the 24 hour mass limit for NO_x. **Table 3 - Tabulation of Reported Exceedances (Mass Limits Eliminated)** shows the number of violations that would remain if exceedances of these limits were eliminated.

Ash Grove also proposed that the concentration limits for NO_x (hourly and 24 hour), SO₂ (hourly) and CO (8 hour) should be increased slightly to adjust for the fact that actual stack flows are lower than those assumed at the time of permitting. **Table 4 - Monthly Tabulation of Reported Exceedances (At New PPM Limits)** shows the number of violations that would have been reported if the proposed limits were in effect at the time.

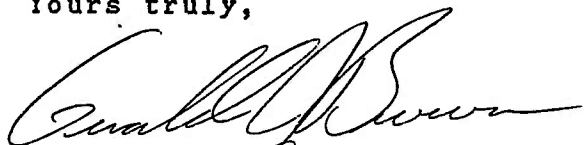
Ash Grove proposed that the permits should be revised to excuse unavoidable exceedances during start-up, shutdown and scheduled maintenance. **Table 5 - Monthly Tabulation of Reported Exceedances (Start up/Shutdown/ Maintenance Eliminated)** shows the effect of eliminating exceedances that occurred under these conditions.

At the June 24 meeting between Jim Nolan, Jay Willenberg and Matt Cohen, Jay and Jim agreed that only one penalty should be assessed for a single emission incident, even if it includes multiple consecutive exceedances of a short term emissions limit. **Table 6 - Monthly Tabulation of Reported Exceedances (Reduced to Incidents)** shows the number of discrete incidents associated with all the exceedances reported in Table 5.

Finally, several of the incidents listed in the Table 6 were the result of excusable upsets. **Table 7 - Monthly Tabulation of Incidents (Upsets Eliminated)** shows the effect of eliminating those incidents that should be excused from penalty under WAC 173-400-107.

We hope this letter provides the information Mr. Nolan requested. We look forward to PSAPCA's prompt action on the permit revisions requested in our May 9 letter.

Yours truly,



Gerald J. Brown
Manager, Safety and Environmental

Copy: Ed Pierce
Hans Steuch
Matt Cohen

Table 1: Monthly Tabulation of Reported Exceedences (Current Permit)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov	0	0	79	150	30	7	1	1	1	1
Dec	2	3	26	17	12	0	1	0	0	0
Jan	0	0	15	11	4	3	1	0	0	0
Feb	0	0	13	6	12	9	1	0	0	0
Mar	24	9	10	3	24	10	1	1	14	9
Apr	0	0	12	5	1	0	1	0	0	0
May	10	6	48	36	14	1	4	1	0	0
June	2	2	19	15	8	0	1	0	0	0
Total	38	20	222	243	105	30	11	3	15	10

Table 2: Monthly Tabulation of Reported Exceedences (Analyzer Malfunctions Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov	0	0	0	0	30	7	1	1	1	1
Dec	2	3	13	4	12	0	1	0	0	0
Jan	0	0	15	11	4	3	1	0	0	0
Feb	0	0	13	6	12	9	1	0	0	0
Mar	24	9	10	3	24	10	1	1	14	9
Apr	0	0	12	5	1	0	1	0	0	0
May	10	6	36	24	14	1	4	1	0	0
June	2	2	19	15	8	0	1	0	0	0
Total	38	20	118	68	105	30	11	3	15	10

Table 3: Monthly Tabulation of Reported Exceedences (Mass Limits Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov	0	0	0	30	1	1
Dec	2	3	13	12	1	0
Jan	0	0	15	4	1	0
Feb	0	0	13	12	1	0
Mar	24	9	10	24	1	14
Apr	0	0	12	1	1	0
May	10	6	36	14	4	0
June	2	2	19	8	1	0
Total	38	20	118	105	11	15

Table 4: Monthly Tabulation of Reported Exceedences (At New PPM Limits)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov	0	0	0	30	1	1
Dec	2	3	13	12	1	0
Jan	0	0	12	2	0	0
Feb	0	0	13	12	1	0
Mar	24	9	10	22	1	14
Apr	0	0	10	1	0	0
May	10	6	35	13	4	0
June	2	2	16	8	0	0
Total	38	20	109	100	8	15

**Table 5: Monthly Tabulation of Reported Exceedences
(Startup/Shutdown/Maintenance Eliminated)**

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov	0	0	0	0	0	1
Dec	2	3	9	7	1	0
Jan	0	0	12	2	0	0
Feb	0	0	7	5	0	0
Mar	24	9	1	7	0	14
Apr	0	0	7	1	0	0
May	10	6	28	5	4	0
June	2	2	16	0	0	0
Total	38	20	80	27	5	15

Table 6: Monthly Tabulation of Reported Exceedences (Reduced to Incidents)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov	0	0	0	0	0	1
Dec	1	1	7	2	1	0
Jan	0	0	9	1	0	0
Feb	0	0	6	1	0	0
Mar	1	1	2	3	0	1
Apr	0	0	7	1	0	0
May	1	1	10	3	3	0
June	1	1	10	0	0	0
Total	4	4	51	11	4	2

Table 7: Monthly Tabulation of Incidents (Upsets Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov	0	0	0	0	0	1
Dec	0	0	7	2	1	0
Jan	0	0	8	1	0	0
Feb	0	0	6	1	0	0
Mar	0	0	2	2	0	0
Apr	0	0	0	1	0	0
May	0	0	1	3	3	0
June	1	1	0	0	0	0
Total	1	1	24	10	4	1